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Attorney for Defendant
TIMOTHY PAIGE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TIMOTHY PAIGE,

Defendant.

Cr. No. S-05-0066 WBS

STIPULATION AND
[PROPOSED] ORDER
RE: STATUS CONFERENCE

The United States of America, through Assistant U.S. Attorney Anne Pings, and defendant Timothy Paige, through his counsel Scott L. Tedmon, hereby stipulate and agree as follows:

1. The indictment charges defendant Paige with one count of 21 U.S.C. §841 - Distribution of Cocaine Base. Additionally, the indictment charges defendant Paige with a prior conviction for a felony drug offense, to wit: felony possession of a controlled substance, Sacramento County, 1993.

2. A status conference date is currently set for April 27, 2005, at 9:00 a.m before United States District Judge William B. Shubb. No trial date is set at this time.

3. The government has provided defense counsel with 65 pages of discovery along with audio tapes and a DVD relating to the alleged charges. After reviewing the discovery provided by the government and discussing the matter with the defendant, defense counsel needs additional time to conduct necessary pre-trial investigation as well as determine what pre-trial motions will be filed,

1 if any. Further, it is anticipated the government will be providing some additional discovery to the
2 defense.

3 4. Based on the foregoing, counsel for the government and counsel for the defendant request
4 that the present status conference date be continued and set for May 25, 2005 at 9:00 a.m. This date
5 has been approved by Sally Hoover.

6 5. Counsel for the government and counsel for the defendant stipulate that time be excluded
7 through May 25, 2005, the date of the status conference, under the Speedy Trial Act for need of
8 counsel to prepare pursuant to 18 U.S.C. §3161(h)(8)(B)(iv), Local Code T4.

9 Finally, Scott L. Tedmon has been authorized by counsel for the government to sign this
10 stipulation on their behalf.

11 **IT IS SO STIPULATED.**

12 DATED: April 19, 2005

McGREGOR W. SCOTT
United States Attorney

13 _____
14 /s/ Anne Pings
ANNE PINGS
Assistant U.S. Attorney

15 DATED: April 19, 2005

LAW OFFICES OF SCOTT L. TEDMON

16 _____
17 /s/ Scott L. Tedmon
SCOTT L. TEDMON
Attorney for Defendant Timothy Paige

18 **ORDER**

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20 GOOD CAUSE APPEARING and based upon the above stipulation, it is hereby ordered that
21 a status conference is set for May 25, 2005 at 9:00 a.m., before the Honorable William B. Shubb.
22 Based upon the above stipulation, it is further ordered that time is excluded under the Speedy Trial
23 Act for need of counsel to prepare pursuant to 18 U.S.C. §3161(h)(8)(B)(iv), Local Code T4.

24 **IT IS SO ORDERED.**

25 Dated: April 21, 2005

26 _____
27 *William B. Shubb*
28 WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

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